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Department of Environment

Ministère de l'Environnement

November 9, 2009

Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 3BM-ARC0810 – Hamlet of Arctic Bay O&M Manual

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Operations and Maintenance Manual & Compliance Plan from the Hamlet of Arctic Bay. The DOE has the following comments and recommendations based on the *Environmental Protection Act*.

LICENCE REQUIREMENTS

Page 9 of the amended 3BM-ARC0810 license states that a number of plans are to be submitted; however, the following have not yet been received:

- Hazardous Waste Management Plan
- Monitoring Program Quality Assurance/Quality Control Plan
- Spill Response Plan for Aggregate Deposits
- Water Supply Facilities Operation and Maintenance Plan

SPILL RESPONSE PLAN

DOE recommends that, under Section 4 of the Spill Response Plan, actual municipal contact names and numbers be provided.

This plan should include a site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill. The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, drainage patterns, and any nearby bodies of water.

SLUDGE MANAGEMENT

Page 9 of the amended water license states guidelines for de-sludging shall be provided in the Manual; however, they are currently not present. DOE recommends that these guidelines be included as soon as possible.

MONITORING

It is unclear whether Table 6.1 is referring to monitoring points for the existing sewage treatment system or the new wastewater treatment facility. Also, the descriptions of these monitoring points are inconsistent with those listed in the water license.

Chapter 6, Section 6 states that sampling procedures are summarized in the appendix; however, none of the appendices contain this information. Furthermore, sampling procedures should be specific to the monitoring requirements.

Chapter 6, Section 5 of the Operations & Maintenance Manual states that *“All analyses shall be performed by a laboratory certified by the Canadian Association for Laboratory Accreditation (CALA), or as otherwise approved by an analyst.”* However, the proponent has not stated which laboratory they intend to contract with. DOE recommends that this be included in the Manual.

A site map outlining all monitoring points should be included in the manual.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Operations and Maintenance Manual & Compliance Plan from the Hamlet of Arctic Bay. Please contact us if you have any questions or comments.

Yours sincerely,

Original signed by

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